

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JUSTIN HEATH SMITH,  
a/k/a "Austin Wolf,"

Defendant.

INFORMATION

25 Cr.

25 CRIM 281

COUNT ONE  
(Enticement of a Minor)

The United States Attorney charges:

1. In or about late 2023 or early 2024, in the Southern District of New York and elsewhere, JUSTIN HEATH SMITH, a/k/a "Austin Wolf," the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and aided and abetted the same, and attempted to do the same, to wit, SMITH and another individual induced a 15-year-old minor to engage in sexual activities while in New York, New York.

(Title 18, United States Code, Sections 2422(b) and 2.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, JUSTIN HEATH SMITH, a/k/a "Austin Wolf," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or

facilitation the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

<b>Description</b>	<b>Serial Number/Unique ID</b>
Silver iPhone	357414192344317
WD MyCloud EX2 Ultra	WUBM31061262
16GB MicroSD Card	01160C21
16GB MicroSD Card	Not Visible
32GB MicroSD Card	8044XV91283J
32GB MicroSD Card	6067XV5075L0
64GB MicroSD Card	20121413
64GB MicroSD Card	8053ZV91E2ZC
1TB SD Card	C1921052250G
Samsung SIM Card	DPHH1E5GW844
WD hard drive	WXE108283138
WD MyPassportUltra	WX11D89E28KV
32GB MicroSD Card	8075XV70234G
256GB MicroSD Card	84250YDTN4MM
WD Elements	WX41D67HYEV1
MicroSD Card	03070XLTH0CX
MicroSD Card	0367DXNPT09J
MicroSD Card	2451DXHSK06S
WD EasyStore	2GGARY9U
WD MyBookDuo	WUBS20160554
WD MyBookDuo	WUBS20362531
Mac Pro	F5KPN06MF9VN
Mac Mini	C07C707QJYW0
Mac Mini	C07WC0UXG1J2
MacBook Pro	C17J645TDTY3

#### Substitute Assets Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2428;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
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JAY CLAYTON  
United States Attorney